

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Schwana Debnam :
Debtor : No. 19-16004-AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtor, by attorney David M. Offen, makes the following Motion to Modify Plan After Confirmation and in support hereof state as follows:

1. Debtors filed a Chapter 13 Petition and Plan with this Court on September 25, 2019.

2. The debtors' Amended Plan provided for a base plan in the amount of \$26,350.00 to be paid in over a 36 month period.

3. The debtors' plan was confirmed on May 13, 2020.

4. The debtor's home was sold at Sheriff's Sale prior to the debtor's filing of the Voluntary Petition.

5. Philadelphia County allows debtors the right to redeem their property up to 9 months after said property is sold at a Sheriff's tax sale.

6. A Proof of Claim was filed on behalf of Philadelphia Lotus 6, LLC. who purchased the property via the Sheriff's tax sale. The secured amount due to be paid to Philadelphia Lotus 6, LLC. through the Chapter 13 plan is \$23,080.20.

7. The debtor has paid a total of \$4,185.00 into the Chapter 13 Trustee over 10 months.

8. The debtor's modified plan will provide for monthly payments in the amount of \$775.00 and continuing for 45 months for a total base amount of \$39,060.00.

9. Debtor respectfully requests her Chapter 13 plan to be

modified to allow for the redemption of her property in consideration of the Claim #7-1 filed on behalf of Philadelphia Lotus 6, LLC.

WHEREFORE, Debtor, by Attorney, respectfully requests that Your Honorable Court enter an Order to reflect that the Modified Chapter 13 Plan attached hereto as Exhibit "A" is hereby approved with a new base amount of \$39,060.00.

Date: 7/6/20

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)
601 Walnut Street
The Curtis Center
Suite 160 West
Philadelphia, PA 19106
215-625-9600